

HCDistrictclerk.com

CHOWDHURY, RAJIB vs. SLATTERY, DANIEL

7/11/2016

Cause: 201627634

CDI: 7

Court: 281

APPEALS

No Appeals found.

COST STATMENTS

No Cost Statments found.

TRANSFERS

No Transfers found.

POST TRIAL WRITS

No Post Trial Writs found.

ABSTRACTS

No Abstracts found.

SETTINGS

No Settings found.

NOTICES

No Notices found.

SUMMARY**CASE DETAILS**

File Date	4/28/2016
Case (Cause) Location	Civil Intake 1st Floor
Case (Cause) Status	Active - Civil
Case (Cause) Type	Motor Vehicle Accident
Next/Last Setting Date	N/A
Jury Fee Paid Date	4/28/2016

COURT DETAILS

Court	281 st
Address	201 CAROLINE (Floor: 14) HOUSTON, TX 77002 Phone:7133686430
JudgeName	SYLVIA A. MATTHEWS
Court Type	Civil

ACTIVE PARTIES

Name	Type	Post Jdgm	Attorney
CHOWDHURY, RAJIB 4909 BISSONNET, BELLAIRE, TX 77401	PLAINTIFF - CIVIL		STERN, JEFFREY M.
SLATTERY, DANIEL 1 GOLF DR., DEERFIELD, WI 53531	DEFENDANT - CIVIL		
BCP TRANSPORTATION INC 1 GOLF DR., DEERFIELD, WI 53531	DEFENDANT - CIVIL		
SLATTERY, DANIEL MAY BE SERVED BY AND THROUGH THE TEXAS 1 GOLF DR, DEEFIELD, WI 53531	REGISTERED AGENT		

BCP TRANSPORTATION INC MAY BE SERVED BY REGISTERED AGENT
AND THROUGH THE TEXAS

INACTIVE PARTIES

No inactive parties found.

JUDGMENT/EVENTS

Date	Description	Order Signed	Post Jdgm	Pgs Volume /Page	Filing Attorney	Person Filing
4/28/2016	JURY FEE PAID (TRCP 216)			0		
4/28/2016	ORIGINAL PETITION			0	STERN, JEFFREY M.	CHOWDHURY, RAJIB

SERVICES

Type	Status	Instrument	Person	Requested	Issued	Served	Returned	Received	Tracking	Deliver To
CITATION (SECRETARY OF STATE NON-RESIDENT)	SERVICE RETURN/EXECUTED	ORIGINAL PETITION	SLATTERY, DANIEL MAY BE SERVED BY AND THROUGH THE TEXAS	4/28/2016	6/2/2016	6/20/2016	6/30/2016		73253298	CIV AGCY-CIVILIAN SERVICE AGENCY
CITATION (SECRETARY OF STATE NON-RESIDENT)	SERVICE RETURN/EXECUTED	ORIGINAL PETITION	BCP TRANSPORTATION INC MAY BE SERVED BY AND THROUGH THE TEXAS	4/28/2016	6/2/2016	6/20/2016	6/30/2016		73253299	CIV AGCY-CIVILIAN SERVICE AGENCY

DOCUMENTS

Number	Document	Post Jdgm	Date	Pgs
70912327	CITATION (Slattery, Daniel May be served By and through the texas		06/30/2016	3
70912328	Citation - (Secretary of State Non-Resident) BCP Transportation		06/30/2016	3
70626564	Civil Process Pick-Up Form		06/13/2016	1
70008278	PLAINTIFFS ORIGINAL PETITION JURY DEMAND AND REQUEST FOR DISCLOSURE		04/28/2016	6
-> 70008279	CIVIL CASE INFORMATION SHEET		04/28/2016	1
-> 70008280	CIVIL PROCESS REQUEST		04/28/2016	1
-> 70008281	COVER LETTER		04/28/2016	1

2016-27634 / Court: 281
CAUSE NO. _____

4/28/2016 3:50:41 PM
Chris Daniel - District Clerk Harris County
Envelope No. 10363977
By: Monica Ovalle
Filed: 4/28/2016 3:50:41 PM

RAJIB CHOWDHURY

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

V.

HARRIS COUNTY, T E X A S

DANIEL SLATTERY and
BCP TRANSPORTATION, INC.

____ JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION, JURY DEMAND
AND REQUEST FOR DISCLOSURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, RAJIB CHOWDHURY, Plaintiff in the above entitled and numbered cause, complaining of and against DANIEL SLATTERY and BCP TRANSPORTATION, INC., Defendants herein, and for causes of action would respectfully show unto the Court the following:

**I.
DISCOVERY CONTROL PLAN**

1.0 Discovery is intended to be conducted under Level 3 of the Texas Rules of Civil Procedure 190.

**II.
PARTIES**

2.0 Plaintiff is a resident of Harris County, Texas.

2.1 Defendant, DANIEL SLATTERY is an individual residing in the State of Wisconsin, who, pursuant to the provisions of Section 17.061, et seq., Texas Civil Practice and Remedies Code, and §17.041, et seq., the Texas Long-Arm Statute, may be served by and through the Texas Transportation Commission, 125 East 11th Street, Austin, Texas 78701-2483, via certified mail, return receipt requested, who shall then forward the citation and petition to Defendant, may be served by and through his last known address: 1 Golf Dr., Deerfield, WI 53531, or wherever he

may be found.

2.2 Defendant, **BCP TRANSPORTATION, INC.**, an entity doing business in Harris County, Texas and pursuant to the provisions of Section 17.061, *et seq.*, Texas Civil Practice and Remedies Code, and §17.041, *et seq.*, the Texas Long-Arm Statute, may be served by and through the Secretary of State, who shall then forward the Original Petition and Citation to Defendant, **BCP TRANSPORTATION, INC.**, addressed to serve with process herein by serving its Registered Agent, Nancy T. Spelsberg, 1 Golf Dr., Deerfield, WI 53531, or wherever he may be found.

III. JURISDICTION & VENUE

3.0 Venue is proper in Harris County, Texas, pursuant to Tex. Civ. Prac. & Rem. Code §15.001 *et seq.*, because all or a substantial part of the events or omissions giving rise to the claims arose in Harris County, Texas. This Court has jurisdiction over the parties and subject matter hereof. The amount in controversy exceeds the minimum jurisdictional limits of this Court.

IV. FACTS

4.0 On or about February 3, 2016, September 29, 2013, Plaintiff was lawfully driving a 2012 Toyota Corolla, traveling southbound in the 12000 block of the North Freeway, located in Harris County, Texas. At the time in question, Defendant **DANIEL SLATTERY** was driving a 2016 Freightliner Tractor Trailer, traveling northbound in the 12000 block of the North Freeway. Defendant disregarded the stop and go signal, striking Plaintiff's vehicle.

4.1 At such time, Defendant **DANIEL SLATTERY** was working in the course and scope of his employment with **BCP TRANSPORTATION, INC.**

V. NEGLIGENCE OF DEFENDANTS

A. DANIEL SLATTERY

5.0 At the time of the accident made the basis of this suit, Defendant, **DANIEL SLATTERY** was operating the aforementioned vehicle in a negligent and careless manner in the following respects which, among others, may be shown at the trial of this cause:

1. In failing to keep a proper lookout;
2. In failing to yield;
3. Disregarding a stop and go signal; and
4. In failing to operate the vehicle in a reasonable and prudent manner.

5.1 Each of these acts and omissions, singularly or in combination with others, constitute negligence which was the proximate cause of this incident, and the injuries sustained by the Plaintiff. Additionally, Defendant's acts or omissions in violating the Texas Transportation Code as listed above constitute negligence per se.

B. BCP TRANSPORTATION, INC.

5.2 The above-described collision was proximately caused by the negligence of Defendant **BCP TRANSPORTATION, INC.** as a result of its negligent entrustment of the subject vehicle to Defendant **DANIEL SLATTERY** when it knew or should have known that he was not a safe driver.

5.3 Defendant **DANIEL SLATTERY** was an agent and/or servant of Defendant **BCP TRANSPORTATION, INC.** As such, Defendant **BCP TRANSPORTATION, INC.** is responsible for the conduct of Defendant **DANIEL SLATTERY** due to the master-servant relationship which existed, and under the doctrine of Respondeat Superior.

**VI.
DAMAGES**

6.0 Said elements of damage which Plaintiff seeks to recover from Defendants include compensation for the following:

1. The physical pain and mental anguish sustained by Plaintiff from date of injury to the time of trial;
2. The physical pain and mental anguish that Plaintiff will suffer in the future;
3. Loss of earnings sustained by Plaintiff from date of injury to time of trial;
4. Loss of earnings and earning capacity reasonably anticipated to be suffered by Plaintiff in the future;
5. Reasonable and necessary medical expenses incurred by Plaintiff in the treatment of Plaintiff's injuries from date of injury to time of trial;
6. Reasonable and necessary medical expenses reasonably anticipated to be sustained by Plaintiff in the future for treatment of Plaintiff's injuries;
7. Past and future physical disfigurement; and
8. Past and future physical impairment;

As such, Plaintiff affirmatively pleads that he seeks monetary relief over \$200,000.00 but not more than \$1,000,000.00.

**VII.
REQUEST FOR JURY TRIAL**

7.0 Plaintiff requests a jury trial.

**VIII.
ALTERNATIVE PARAGRAPH NO. 1**

8.0 In the alternative, Plaintiff would show that if any injury and/or condition from which he currently suffers was pre-existing, then such condition was aggravated and/or exacerbated by the negligence of the Defendants herein.

**IX.
ALTERNATIVE PARAGRAPH NO. 2**

9.0 In the alternative, Plaintiffs would show that if they suffer from any subsequent injury and/or condition, then such injury and/or condition was aggravated and/or exacerbated by the negligence of the Defendants herein.

**X.
REQUEST FOR DISCLOSURE**

10.0 Pursuant to Rule 194 of the Texas Rules of Civil Procedure, you are hereby requested to disclose, within fifty (50) days of service of this document, the information or material described below. Please serve your responses on counsel representing this Plaintiff, and produce true and correct copies of all documents and other tangible items with your responses, in accordance with Rule 194.4.

10.1 Plaintiff requests disclosure of the following, pursuant to Rules 194.2(a) through 194.2(l):

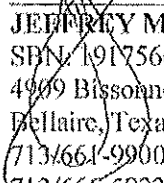
- (a) the correct names of the parties to the lawsuit;
- (b) the name, address, and telephone number of any potential parties;
- (c) the legal theories and, in general, the factual bases of Defendant's claims or defenses;
- (d) the amount and any method of calculating economic damages;
- (e) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;
- (f) for any testifying expert:
 - (1) the expert's name, address, and telephone number;
 - (2) the subject matter on which the expert will testify;
 - (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of Defendant, documents reflecting such information;
 - (4) if the expert is retained by, employed by, or otherwise subject to the control of Defendant:
 - (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - (B) the expert's current resume and bibliography;

- (g) any discoverable indemnity and insuring agreements;
- (h) any discoverable settlement agreements;
- (i) any discoverable witness statements;
- (j) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills;
- (k) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.
- (l) the name, address, and telephone number of any person who may be designated as a responsible third party.

**XI.
PRAYER**

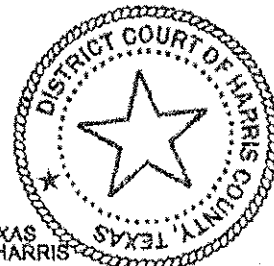
WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that these Defendants be cited to appear and answer herein, and that upon final trial hereof, Plaintiff recovers from said Defendants, jointly and severally, a sum over \$200,000.00 but not more than \$1,000,000.00, costs of Court, pre-judgment and post-judgment interest at the legal rate, and demand for judgment for all other relief to which the Plaintiff deemed entitled.

Respectfully submitted,
THE STERN LAW GROUP



JEFFREY M. STERN
SEN. 19175660
4909 Bissonnet St., Suite 100
Bellaire, Texas 77401
713/661-9900
713/666-5922 Facsimile
Email: jstern@stern-lawgroup.com

ATTORNEY FOR PLAINTIFFS



STATE OF TEXAS
COUNTY OF HARRIS

I, Chris Daniel, District Clerk of Harris County, Texas, certify that
this is a true and correct copy of the original record filed and or recorded
in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this

6-2-16
CHRIS DANIEL, DISTRICT CLERK
HARRIS COUNTY, TEXAS

Deputy

CAUSE NO. 201627634

RECEIPT NO.

0.00

CIV

TR # 73253299

PLAINTIFF: CHOWDHURY, RAJIB
vs.
DEFENDANT: SLATTERY, DANIEL

In The 281st
Judicial District Court
of Harris County, Texas
281ST DISTRICT COURT
Houston, TX

CITATION (SECRETARY OF STATE NON-RESIDENT)

THE STATE OF TEXAS
County of Harris

TO: BCP TRANSPORTATION INC MAY BE SERVED BY AND THROUGH THE TEXAS
SECRETARY OF STATE P O BOX 12079 AUSTIN TEXAS 78711-2079
OR WHEREVER HE MAY BE FOUND
FORWARD TO: NANCY T SPELSBERG

1 GOLF DR DEERFIELD WI 53531

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND JURY DEMAND

RECEIVED
SECRETARY OF STATE

JUN 20 2016

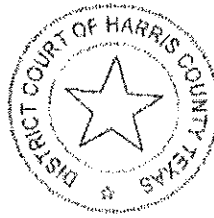
Service of Process

This instrument was filed on the 28th day of April, 2016, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 2nd day of June, 2016, under my hand and seal of said Court.



Chris Daniel

CHRIS DANIEL, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Issued at request of:

STERN, JEFFREY M.
4909 BISSONNET, SUITE 100
BELLAIRE, TX 77401
Tel: (713) 661-9900
Bar No.: 19175660

Generated By: COLLINS, IRIS TROISHA IKS//10370314

STATE OF _____

County of _____

OFFICER/AUTHORIZED PERSON RETURN

PERSONALLY APPEARED before me, the undersigned authority, _____
who being by me duly sworn, deposes and says that in the County of _____
State of _____ he delivered to the within named defendants in person at the
following times and places to wit:

NAME	DATE			TIME		PLACE
	MONTH	DAY	YEAR	HR	MIN	

a true copy of this notice, with a copy of:

accompanying same; and further, that he is an adult and is in no manner interested in this suit and is the person competent to make oath of the fact.

TO: BCP TRANSPORTATION INC MAY BE SERVED BY AND THROUGH THE TEXAS
 SECRETARY OF STATE P O BOX 12079 AUSTIN TEXAS 78711-2079
 OR WHEREVER HE MAY BE FOUND
 FORWARD TO: NANCY T SPELSBERG

1 GOLF DR DEERFIELD WI 53531

RECEIVED
 SECRETARY OF STATE

JUN 20 2016

Service of Process

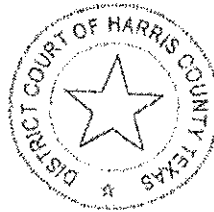
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TO OFFICER SERVING:

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Chris Daniel

CHRIS DANIEL, District Clerk
 Harris County, Texas
 201 Caroline, Houston, Texas 77002
 (P.O. Box 4631, Houston, Texas 77210)

Issued at request of:

STERN, JEFFREY M.
 4909 BISSONNET, SUITE 100
 BELLAIRE, TX 77401
 Tel: (713) 661-9900
 Bar No.: 19175660

Generated By: COLLINS, IRIS TROISHA IKS//10370314

STATE OF _____

OFFICER/AUTHORIZED PERSON RETURN

County of _____

PERSONALLY APPEARED before me, the undersigned authority, _____
 who being by me duly sworn, deposes and says that in the County of _____
 State of _____ he delivered to the within named defendants in person at the
 following times and places to wit:

NAME	DATE			TIME		PLACE
	MONTH	DAY	YEAR	HOUR	MIN	

a true copy of this notice, with a copy of:

accompanying same; and further, that he is an adult and is in no manner interested in this suit and is the person competent to make oath of the fact.

 Affiant/Deputy

On this day, _____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

 Notary Public

267335

The State of Texas



Service of Process
P.O. Box 12079
Austin, Texas 78711-2079

Phone: 512-463-5560
Fax: 512-463-0873
TTY (800) 735-2989
www.sos.state.tx.us

Secretary of State

June 23, 2016

BCP Transportation Inc
Nancy T Spelsberg
1 Golf Dr
Deerfield, WI 53531

2016-267335-1
Include reference number in
all correspondence

RE: Rajib Chowdhury VS Daniel Slattery and BCP Transportation, Inc.
281st Judicial District Court Of Harris County, Texas
Cause No: 201627634

Dear Sir/Madam,

Pursuant to the Laws of Texas, we forward herewith by CERTIFIED MAIL, return receipt requested, a copy of process received by the Secretary of State of the State of Texas on June 20, 2016.

CERTIFIED MAIL #71901046470100624602

Refer correspondence to:

Jeffrey M. Stern
The Stern Law Group
4909 Bissonnet St., Suite 100
Bellaire, TX 77401

Sincerely,

A handwritten signature in black ink that reads "Venita Okpegbue".

Venita Okpegbue
Team Leader, Service of Process
GF/mr
Enclosure

Secretary of State
Service of Process
P.O. Box 12079
Austin, Texas 78711-2079



7190 1046 4701 0062 4602

Return Receipt (Electronic)

2016267335-1

BCP Transportation Inc
Nancy T Spelsberg
1 Golf Dr
Deerfield, WI 53531

CUT / FOLD HERE

6/30/2016 4:38:25 PM
Chris Daniel - District Clerk Harris County
Envelope No. 11431070
By: DAIGURI ROY
Filed: 6/30/2016 4:38:25 PM

CAUSE NO. 201627634

RECEIPT NO.

0.00

CIV

TR # 73253298

PLAINTIFF: CHOWDHURY, RAJIB
vs.
DEFENDANT: SLATTERY, DANIEL

In The 281st
Judicial District Court
of Harris County, Texas
281ST DISTRICT COURT
Houston, TX

CITATION (SECRETARY OF STATE NON-RESIDENT)

THE STATE OF TEXAS
County of Harris

TO: SLATTERY, DANIEL MAY BE SERVED BY AND THROUGH THE TEXAS
TRANSPORTATION COMMISSION 125 EAST 11 TH STREET AUSTIN 78701-2483
OR WHEREVER HE MAY BE FOUND
FORWARD TO:

1 GOLF DR DEEFIELD WI 53531

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND JURY DEMAND

This instrument was filed on the 28th day of April, 2016, in the above cited cause number
and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 2nd day of June, 2016, under my hand and
seal of said Court.

Issued at request of:
STERN, JEFFREY M.
4909 BISSONNET, SUITE 100
BELLAIRE, TX 77401
Tel: (713) 661-9900
Bar No.: 19175660



Chris Daniel

CHRIS DANIEL, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Generated By: COLLINS, IRIS TROISHA IKS//10370314

STATE OF _____

OFFICER/AUTHORIZED PERSON RETURN

County of _____

PERSONALLY APPEARED before me, the undersigned authority, _____
who being by me duly sworn, deposes and says that in the County of _____
State of _____ he delivered to the within named defendants in person at the
following times and places, to wit:

NAME	DATE			TIME		PLACE
	MONTH	DAY	YEAR	HOUR	MIN	

a true copy of this notice, with a copy of:

accompanying same; and further, that he is an adult and is in no manner interested in this suit
and is the person competent to make oath of the fact.

Affiant/Deputy

On this day, _____, known to me to be the person whose
signature appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited on the
return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

AMENDED AFFIDAVIT OF SERVICE

State of Texas

County of Harris

281st Judicial District Court

Case Number: 201627634

Plaintiff:
RAJIB CHOWDHURY

vs.

Defendant:
DANIEL SLATTERY, ET AL

For:
Jeffrey Stern
Stern Law Group
4909 Bissonnet, Suite 100
Bellaire, TX 77401

Received by THE HAWKINS AGENCY on the 13th day of June, 2016 at 10:53 am to be served on DANIEL SLATTERY BY DELIVERING TO THE TEXAS TRANSPORTATION COMMISSION, 125 EAST 11TH STREET, AUSTIN, TRAVIS County, TX 78701.

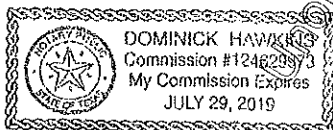
I, Matt Miller, being duly sworn, depose and say that on the 20th day of June, 2016 at 6:59 am, I:

delivered a true copy of the Citation, Plaintiff's Original Petition, Jury Demand and Request for Disclosure to: DANIEL SLATTERY BY DELIVERING TO THE TEXAS TRANSPORTATION COMMISSION at the address of: 125 EAST 11TH STREET, AUSTIN, TRAVIS County, TX 78701, by Certified Mail Return Receipt Requested in compliance with state statutes.

I am an authorized private process server, authorized by the Texas Supreme Court. I am over the age of eighteen (18) and I am not a party to nor interested in the outcome of this lawsuit. I am of sound mind and capable of making this Affidavit. I am fully competent to testify to the matters stated herein. I am personally acquainted with the facts herein stated in this Affidavit which are true and correct.

Subscribed and Sworn to before me on the 24th day of June, 2016 by the affiant who is personally known to me.

NOTARY PUBLIC



A handwritten signature in black ink that reads "Matt Miller".

Matt Miller
SCH-9756 EXP: 6/30/18

THE HAWKINS AGENCY
P. O. Box 2601
Houston, TX 77252-2601
(281) 888-3991

Our Job Serial Number: THA-2016001882
Ref: 40246.21 RAJIB CHOWDHURY (TG)

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking®



Customer Service :

Have questions? We're here to help.



Get Easy Tracking Updates :

Sign up for My USPS.

Tracking Number: 70160340000974236072

Product & Tracking Information

Postal Product:
First-Class Mail®Features:
Certified Mail™

Return Receipt

See tracking for related item: 9590940213385285156508

Available Actions

Text Updates

Email Updates

June 20, 2016, 6:59 am	Delivered	AUSTIN, TX 78714
June 18, 2016, 7:58 am	Available for Pickup	AUSTIN, TX 78714
June 18, 2016, 5:05 am	Arrived at Unit	AUSTIN, TX 78714
June 18, 2016, 1:59 am	Departed USPS Destination Facility	AUSTIN, TX 78710
June 17, 2016, 9:41 am	Arrived at USPS Destination Facility	AUSTIN, TX 78710
June 16, 2016, 11:30 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
June 16, 2016, 2:49 pm	Acceptance	HOUSTON, TX 77019

Track Another Package

Tracking (or receipt) number

Track It

PS Form 3817, July 2015 PSN 7530-02-000-9003 7/16-1882

Domestic Return Receipt

9590 9402 1338 5285 1565 08

Article Number (transfer from service label)
70160340000974236072

3. Service Type

☐ Adult Signature
☒ Certified Mail®
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Full Restricted Delivery

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☒ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Restricted Delivery

Article Addressed to:
 Daniel Slattery
 910 TX Transportation Commission
 125 East 11th Street
 Austin, TX 78701

1. Complete items 1, 2, and 3.
 2. Print your name and address on the reverse so that we can return the card to you.
 3. Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature
☒ Agent
☐ Addressee

B. Return Receipt Date of Delivery
 Randall Todd
 7/20/2016

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

Unofficial Copy Office of Chris Daniel

6/30/2016 4:36:23 PM
 Chris Daniel - District Clerk Harris County
 Envelope No. 11430965
 By: DAIQURI ROY
 Filed: 6/30/2016 4:36:23 PM

CAUSE NO. 201627634

RECEIPT NO.

0.00

CIV

TR # 73253299

PLAINTIFF: CHOWDHURY, RAJIB
 vs.
 DEFENDANT: SLATTERY, DANIEL

In The 281st
 Judicial District Court
 of Harris County, Texas
 281ST DISTRICT COURT
 Houston, TX

CITATION (SECRETARY OF STATE NON-RESIDENT)

THE STATE OF TEXAS
 County of Harris

TO: BCP TRANSPORTATION INC MAY BE SERVED BY AND THROUGH THE TEXAS
 SECRETARY OF STATE P O BOX 12079 AUSTIN TEXAS 78711-2079
 OR WHEREVER HE MAY BE FOUND
 FORWARD TO: NANCY T SPELSBERG

1 GOLF DR DEERFIELD WI 53531

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND JURY DEMAND

This instrument was filed on the 28th day of April, 2016, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 2nd day of June 2016, under my hand and seal of said Court.

Issued at request of:
 STERN, JEFFREY M.
 4909 BISSONNET, SUITE 100
 BELLAIRE, TX 77401
 Tel: (713) 661-9900
 Bar No.: 19175660



Chris Daniel

CHRIS DANIEL, District Clerk
 Harris County, Texas
 201 Caroline, Houston, Texas 77002
 (P.O. Box 4651, Houston, Texas 77210)

Generated By: COLLINS, IRIS TROISHA IKS//10370314

STATE OF _____

OFFICER/AUTHORIZED PERSON RETURN

County of _____

PERSONALLY APPEARED before me, the undersigned authority, _____
 who being by me duly sworn, deposes and says that in the County of _____
 State of _____ he delivered to the within named defendants in person at the
 following times and places to-wit:

NAME	DATE			TIME		PLACE
	MONTH	DAY	YEAR	HOOR	MIN	

a true copy of this notice, with a copy of:

accompanying same; and further, that he is an adult and is in no manner interested in this suit and is the person competent to make oath of the fact.

Affiant/Deputy

On this day, _____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

AFFIDAVIT OF SERVICE

State of Texas

County of Harris

281st Judicial District Court

Case Number: 201627634

Plaintiff:
RAJIB CHOWDHURY

vs.

Defendant:
DANIEL SLATTERY, ET AL

For:
Jeffrey Stern
Stern Law Group
4909 Bissonnet, Suite 100
Bellaire, TX 77401

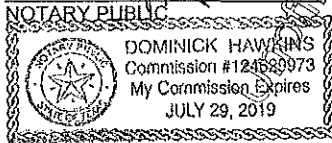
Received by THE HAWKINS AGENCY on the 13th day of June, 2016 at 10:38 am to be served on BCP TRANSPORTATION INC BY DELIVERING TO THE TEXAS SECRETARY OF STATE, P.O. BOX 12079, AUSTIN, TRAVIS County, TX 74711.

I, Matt Miller, being duly sworn, depose and say that on the 20th day of June, 2016 at 6:04 am, I:

delivered a true copy of the Citation, Plaintiff's Original Petition, Jury Demand and Request for Disclosure to: BCP TRANSPORTATION INC BY DELIVERING TO THE TEXAS SECRETARY OF STATE at the address of: P.O. BOX 12079, AUSTIN, TRAVIS County, TX 74711, by Certified Mail Return Receipt Requested in compliance with state statutes.

I am an authorized private process server, authorized by the Texas Supreme Court. I am over the age of eighteen (18) and I am not a party to nor interested in the outcome of this lawsuit. I am of sound mind and capable of making this Affidavit. I am fully competent to testify to the matters stated herein. I am personally acquainted with the facts herein stated in this Affidavit which are true and correct.

Subscribed and Sworn to before me on the 24th day of June, 2016 by the affiant who is personally known to me.



Matt Miller
SCH-9756 EXP: 6/30/18

THE HAWKINS AGENCY
P. O. Box 2601
Houston, TX 77252-2601
(281) 888-3991

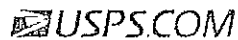
Our Job Serial Number: THA-2016001881
Ref: 40246.21 RAJIB CHOWDHURY (TG)

English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking®

Customer Service

Have questions? We're here to help.

Get Easy Tracking Updates

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Tracking Number: 70160340000074236126

Updated Delivery Day: Monday, June 20, 2016

Product & Tracking Information

Postal Product:
First-Class Mail®Features:
Certified Mail™

Return Receipt

See tracking for related item: 9590940213385285155648

Date	Event	Location
June 20, 2016, 5:04 am	Delivered, PO Box	AUSTIN, TX 78711
June 18, 2016, 11:53 am	Available for Pickup	AUSTIN, TX 78711
June 18, 2016, 11:01 am	Available for Pickup	AUSTIN, TX 78711
June 18, 2016, 11:00 am	Sorting Complete	AUSTIN, TX 78711
June 18, 2016, 10:56 am	Arrived at Unit	AUSTIN, TX 78711
June 18, 2016, 8:47 am	Departed USPS Facility	AUSTIN, TX 78710
June 17, 2016, 9:41 am	Arrived at USPS Destination Facility	AUSTIN, TX 78710
June 16, 2016, 11:30 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
June 16, 2016, 2:49 pm	Acceptance	HOUSTON, TX 77019

Track Another Package

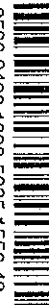
Tracking (or receipt) number

Track It

Available Actions

Test Updates

9590 9402 1338 5285 1556 48



1. Article Addressed to:
PCP Transportation Inc
c/o TX Secretary of State
P.O. Box 12079
Austin, TX 78711

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION (RECEIVER)

A. Signature

X

B. Received by (Printed Name)

C. Date of Delivery

☐ Agent
☐ Addressee
D. Is delivery restricted from item 1? ☐ Yes ☐ NoIf delivery is restricted, specify below: ☐ No

3. Service Type

☐ Adult Signature
☒ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Mail Restricted Delivery

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

16-1881

Domestic Return Receipt

Unofficial Copy Office of the District Attorney
Daniel D. O'Connell

Cause Number: 2016-27634

RAJIB CHOWDHURY	§	IN THE DISTRICT COURT OF
	§	
VS	§	HARRIS COUNTY, TEXAS
	§	
DANIEL SLATTERY and	§	
BCP TRANSPORTATION, INC.	§	281 ST JUDICIAL DISTRICT

DEFENDANTS' ORIGINAL ANSWER AND REQUEST FOR JURY TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, DANIEL SLATTERY AND BCP TRANSPORTATION, INC. Defendants in the above-entitled and numbered cause, and files its Original Answer, respectfully showing unto the Court as follows:

I.

Defendants generally deny the allegations of the petition and thus asserts the privilege of having such allegations proved by a preponderance of the evidence. Defendants will amend this answer as necessary.

II.

Defendants, DANIEL SLATTERY AND BCP TRANSPORTATION, INC., hereby requests a trial by jury. The applicable jury fee has been tendered to the clerk of the court.

WHEREFORE, PREMISES CONSIDERED, Defendants, DANIEL SLATTERY AND BCP TRANSPORTATION, INC., pray that, upon final hearing hereof, Plaintiff not recover as prayed for in Plaintiff's Original Petition, and for such other and further relief, at law or in equity, as Defendants, DANIEL SLATTERY AND BCP TRANSPORTATION, INC., may show itself justly entitled to receive.

Respectfully submitted,

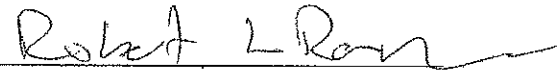
RAMEY, CHANDLER, QUINN & ZITO, P.C.



Robert L. Ramey
Southern District No. 5535
State Bar No. 16498200
750 Bering Drive, Suite 600
Houston, Texas 77057
Telephone: (713) 266-0074
Facsimile: (713) 266-1064
Email: rcqz-eservice@ramey-chandler.com
Attorney for Defendants,
DANIEL SLATTERY and BCP
TRANSPORTATION, INC.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument was served upon the parties listed below by facsimile, certified mail, return receipt requested, first class U.S. mail, electronic mail by the clerk of the court, and/or by messenger on the 11th day of July, 2016.



Robert L. Ramey

Jeffrey M. Stern
The Stern Law Group
4909 Bissonnet Street, Suite 100
Bellaire, Texas 77401
(713) 666-5922- fax